

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR MANAGEMENT
and Gary Division of Air Pollution Control**

**Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, Indiana 46404**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 089-5330-00161	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Gary Division of Air Pollution Control. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a miscellaneous metal working and bridge beam fabrication source.

Authorized individual:	Daniel Moore
Source Address:	86 North Bridge Street, Gary, Indiana 46404
Mailing Address:	86 North Bridge Street, Gary, Indiana 46404
Phone Number:	219 - 885 - 7600
SIC Code:	3441 and 3449
County Location:	Lake County
Source Location Status:	Severe Nonattainment for NO _x Severe Nonattainment for VOC Attainment for CO Primary Nonattainment SO _x Primary Nonattainment TSP Moderate Nonattainment PM ₁₀
Source Status:	Federally Enforceable State Operating Program (FESOP) Minor Source, Under Emission Offset Rules: Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19 tons of VOC delivered to the applicators per year, limited to less than 19 tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and limited to less than 9,881 gallons of paint with a density 21.3 pounds per gallon twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 144,000 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.
 - (2) Twenty-one (21) space heaters, identified as EU #8, rated at 2.1 million British thermal units per hour total.
 - (3) Twelve (12) down-flow heaters, identified as EU #8, rated at 0.600 million British thermal units per hour each or 7.2 million British thermal units per hour total.

- (4) Twenty-eight (28) radiant heaters, identified as EU #8, rated at 0.175 million British thermal units per hour each or 4.9 million British thermal units per hour total.
 - (5) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.
- (b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) open parts washers, identified as EU #12.
- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.

- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.
- (r) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.
- (s) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Gary Division of Air Pollution Control, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Gary Division of Air Pollution Control.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAM, and Gary Division of Air Pollution Control within a reasonable time, any information that IDEM, OAM, and Gary Division of Air Pollution Control may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and Gary Division of Air Pollution Control when applicable) copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM and Gary Division of Air Pollution Control may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Gary Division of Air Pollution Control on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and Gary Division of Air Pollution Control may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, and Gary Division of Air Pollution Control upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM, and Gary Division of Air Pollution Control. IDEM, OAM, and Gary Division of Air Pollution Control may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other

requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and Gary Division of Air Pollution Control, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Gary Division of Air Pollution Control

Local Agency Telephone No.: 219-882-3007

Local Agency Facsimile No.: 219-882-3012

Failure to notify IDEM, OAM and Gary Division of Air Pollution Control, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Management

100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control

Suite 1012

504 Broadway

Gary, Indiana 46402

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and Gary Division of Air Pollution Control, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and Gary Division of Air Pollution Control, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

within ten (10) calendar days from the date of the discovery of the deviation. The failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM or Gary Division of Air Pollution Control determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM or Gary Division of Air Pollution Control, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and Gary Division of Air Pollution Control, at least thirty (30) days in advance of the date this permit is to be

reopened, except that IDEM, OAM and Gary Division of Air Pollution Control, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and Gary Division of Air Pollution Control, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Gary Division of Air Pollution Control when applicable) on or before the date it is due.

- (2) If IDEM, OAM and Gary Division of Air Pollution Control, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and Gary Division of Air Pollution Control takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and Gary Division of Air Pollution Control, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and Gary Division of Air Pollution Control, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,

the Permittee shall allow IDEM, OAM, and Gary Division of Air Pollution Control U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and Gary Division of Air Pollution Control, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM and Gary Division of Air Pollution Control within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, and Gary Division of Air Pollution Control, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, and Gary Division of Air Pollution Control that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Gary Division of Air Pollution Control upon request and shall be subject to review and approval by IDEM, OAM, and Gary Division of Air Pollution Control. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

- (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Gary Division of Air Pollution Control on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Gary Division of Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Gary Division of Air Pollution Control within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Gary Division of Air Pollution Control on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19 tons of VOC delivered to the applicators per year, limited to less than 19 tons of VOC delivered to the applicators per year and limited to less than 9,881 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 144,000 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The one (1) paint booth, identified as EU #15, shall:
- (1) Use less than nineteen (19) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
 - (2) Use less than 9,881 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (b) The input of steel plates and shapes to the mechanical blaster, identified as EU #1 shall be limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (c) The input of steel plates and shapes to the mechanical blaster, identified as EU #2 shall be limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (d) The input of rods to the twelve (12) electric arc stick welders, identified as EU #9 shall be limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (e) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to 144,000 square feet of steel plates per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (f) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (g) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

- (h) The throughput of steel to the forty-seven (47) torches, (excluding the two (2) DB torches) identified as EU #13, shall be limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (i) The input of wire to the twelve (12) submerged arc welding heads, identified as EU #17 shall be limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1]

- (a) The particulate matter (PM) emissions from each of the three (3) blasters, identified as EU #1, EU #2 and EU #18, shall not exceed 0.03 grains per dry standard cubic foot for Stacks #1, #2 and #18, equivalent to:
 - (1) 5.74 pounds per hour at a flow rate of 22,330 dry standard cubic feet per minute for EU #1,
 - (2) 1.57 pounds per hour at a flow rate of 6,100 dry standard cubic feet per minute for EU #2, and
 - (3) 6.43 pounds per hour at a flow rate of 25,000 dry standard cubic feet per minute for EU #18.
- (b) The particulate matter (PM) emissions from EU #9, EU #11, EU13 and EU #17, shall not exceed 0.03 grains per dry standard cubic foot. Those facilities which do not have stacks or vents and are not totally enclosed shall comply with 326 IAC 5-1 and 326 IAC 6-4 in lieu of 0.03 grains per dry standard cubic foot requirement of 326 IAC 6-1-2(a).

D.1.3 PM₁₀ [326 IAC 2-8-4] [326 IAC 2-3]

- (a) Pursuant to 326 IAC 2-8-4, the individual emissions units shall not exceed the following hourly PM₁₀ emission limits and PM₁₀ emission factors:

Process	Hourly PM ₁₀ Emission Limit (pounds per hour)
EU #1, Blaster #1	5.74
EU #2, Blaster #2	1.57
EU #18, Blaster #3	3.21

Process	PM ₁₀ Emission Factor (pounds of PM ₁₀ per 1,000 pounds of rods consumed)
EU #9, 12 Stick Welders	18.4

Process	PM ₁₀ Emission Factor (pounds of PM ₁₀ per square foot of plate swept)
EU #11, 2 Sweep Grinders	18.4

Process	PM ₁₀ Emission Factor (pounds of PM ₁₀ per pound of slab ground)
EU #11, 2 Slab Grinders	0.000493

Process	PM ₁₀ Emission Factor (pounds of PM ₁₀ per 1,000 inches of one (1) inch thick steel cut)
EU #13, 49 Cutting Torches	0.0815

Process	PM ₁₀ Emission Factors (pounds of PM ₁₀ per pound of wire consumed)
EU #17, 12 Submerged Arc Welders	0.036

- (b) Compliance with these PM₁₀ emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and 326 IAC 2-3 do not apply.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in EU #15 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis. The daily volume weighted average of VOC content shall be calculated only when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{c = n}{3 \text{ coating } c \text{ (gal)} \times \text{VOC content of } c \text{ (lbs/gal, less water)}} \\ c = 1$$

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #15 and EU #17 and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM₁₀ testing of EU #1, #2 and #18 (blasters #1, #2 and #3) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM₁₀, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(a) and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM and Gary Division of Air Pollution Control reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the EU #1, EU #2 and EU #18 (blasters #1, #2 and #3) at all times that the blasting processes are in operation.
- (b) The smoke eliminators associated with the two (2) DB torches in EU #13 shall be in operation at all times that the DB torches are in operation.

D.1.10 Visible Emissions Notations

- (a) Daily visible emission notations of the blaster stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Daily visible emission notations of the DB torches smoke eliminator exhausts in EU #13 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the blasting processes, at least once per shift when the blasting processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses for blasters #1 and #2 shall be maintained within the range of 2.0 and 6.0 inches of water and within the range of 1.0 and 4.0 inches of water for blaster #3 or a range established during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Gary Division Air Pollution Control and shall be calibrated at least once every six (6) months.

D.1.12 Monitoring of Smoke Eliminators

Daily inspections shall be performed to verify the placement and integrity of the smoke eliminators associated with the two (2) DB torches in EU #13. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.13 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the blasting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.14 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.15 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1(a) and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.1.1(a) and D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day, if necessary;
 - (4) The cleanup solvent usage for month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
 - (b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the three (3) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.
 - (c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
 - (d) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13 and the dates the vents are redirected.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) through D.1.1(i) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - Four (4) open parts washers, identified as EU #12.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (r) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.
- (s) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The VOC delivered to the applicators in the one (1) armor painting area, identified as EU #10 and the VOC used by the four (4) open parts washers, identified as EU #12, shall be less than a total of 4.50 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the brazing equipment, cutting torches soldering equipment, welding equipment structural steel and bridge fabrication activities and hand grinding shall be limited to 0.03 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6-1-2(b)(5), the particulate matter emission from the 1.80 million British thermal units per hour natural gas-fired boiler, identified as EU #7, shall not exceed 0.01 grains per dry standard cubic foot of exhaust air. This emission limit also satisfies the requirements of 326 IAC 6-2-2.

D.2.3 Organic Solvent Degreasing Operations: Open top vapor degreaser operation [326 IAC 8-3-3]

The four (4) open parts washers, identified as EU #12, are subject to this rule. The owner or operator of open top vapor degreasers shall:

- (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing work loads through the degreaser;
- (c) minimize solvent carryout by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in EU #10 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis. The daily volume weighted average of VOC content shall be calculated only when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating

less water using the following formula, where n is the number of coatings (c):

$$\frac{c = n}{3 \text{ coating } c \text{ (gal)} \times \text{VOC content of } c \text{ (lbs/gal, less water)}} \\ \frac{c = 1}{3 \text{ coating } c \text{ (gal)}} \\ c = 1$$

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM and Gary Division of Air Pollution Control reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.2.1 and D.2.3.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day, if necessary;
 - (4) The cleanup solvent usage for month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and Gary Division of Air Pollution Control

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than nineteen (19) tons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: Gallons of paint with a density of 21.3 pounds per gallon
Limit: Less than 9,881 gallons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Gallons of Paint	Gallons of Paint	Gallons of Paint
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Mechanical blasters #1 and #2, EU #1 and EU #2
Parameter: Input of steel plates and shapes
Limits: 1,253,916 linear feet per twelve (12) consecutive month period, rolled monthly for EU #1.
2,102,400 linear feet per twelve (12) consecutive month period, rolled monthly for EU #2.

YEAR: _____

Month	EU #1 Linear Feet	EU #2 Linear Feet	EU #1 Linear Feet	EU #2 Linear Feet	EU #1 Linear Feet	EU #2 Linear Feet
	This Month	This Month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Twelve (12) electric arc stick welders, EU #9
Parameter: Rods
Limit: Fifty (50) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Rods (tons)	Rods (tons)	Rods (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Twelve (12) submerged arc welding heads, EU #17
Parameter: Wire
Limit: One hundred and thirty (130) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Wire (tons)	Wire (tons)	Wire (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Two (2) plate sweep grinders, EU #11
Parameter: Area of steel plates swept
Limit: 144,00 square feet of steel plates swept per twelve (12) consecutive month period,
rolled monthly.

YEAR: _____

Month	Steel Plates Swept (tons)	Steel Plates Swept (tons)	Steel Plates Swept (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Two (2) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: 71,866 tons of steel slabs ground per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Forty-seven (47) torches (excluding the two (2) DB torches), EU #13
Parameter: Inches of one (1) inch steel cut
Limit: 34,601,227 inches total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Inches of one (1) inch steel cut	Inches of one (1) inch steel cut	Inches of one (1) inch steel cut
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) armor painting area, EU #10 and four (4) parts washers, EU #12
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents plus VOC usage in the parts washers
Limit: Less than four and one-half (4.5) tons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Gary Division of Air Pollution Control**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management
and Gary Division of Air Pollution Control

Technical Support Document (TSD)
for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, Indiana 46404
County:	Lake
SIC Code:	3441 & 3449
Operation Permit No.:	F 089-5330-00161
Permit Reviewer:	Mark L. Kramer

The Office of Air Management (OAM) has reviewed a FESOP application from Industrial Steel Construction, Inc. relating to the operation of a miscellaneous metal working and bridge beam fabrication source.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19 tons of VOC delivered to the applicators per year, limited to less than 19 tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and limited to less than 9,881 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 144,000 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

Unpermitted Emission Units Removed From Service

#1 Blaster Conveyor Line

- (j) One (1) Binks spray paint booth, identified as EU #3, with dry filters for particulate control, installed in 1968, exhausting through Stack #3, capacity: 12 discrete steel plates and shapes per hour (96 pieces per turn) used on an experimental basis and was dismantled in 1997.
- (k) One (1) hot air paint drying oven, identified as EU #4, rated at 0.88 million British thermal units per hour, installed in 1995, exhausting through Stack #4, capacity: 12 discrete steel plates and shapes per hour (96 pieces per turn), dismantled in 1997.

Girder Shop

- (l) One (1) pneumatic blaster, identified as EU #5, installed in 1992, exhausting through Stack #5, capacity: 0.125 girders per hour (1 girder per turn) based on calculations with application, with a maximum media throughput of 11,806 pounds per hour. Shut down and removed and replaced by EU #18.
- (m) One (1) pneumatic blaster, identified as EU #6, installed in 1993, exhausting through Stack #6, 0.375 plates per hour (3 plate per turn), with a maximum media throughput of 9,985.96 pounds per hour. Shut down and removed and replaced by Blaster #3, EU #18

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.
 - (2) Twenty-one (21) space heaters, identified as EU #8, rated at 2.1 million British thermal units per hour total.
 - (3) Twelve (12) down-flow heaters, identified as EU #8, rated at 0.600 million British thermal units per hour each or 7.2 million British thermal units per hour total.
 - (4) Twenty-eight (28) radiant heaters, identified as EU #8, rated at 0.175 million British thermal units per hour each or 4.9 million British thermal units per hour total.
 - (5) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.
- (b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

- (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) open parts washers, identified as EU #12.
- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.
- (r) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day of 2.5 tons per year of any combination of HAPs: armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.
- (s) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

Existing Approvals

The source has been operating under no previous approvals.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on February 16, 1996. Additional information was received on October 18, November 12, December 11, 1996, January 7, 1997, April 22, 1997, December 14, 1998, March 23, April 14, 26 and May 15, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 10 of 10 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	8,149
PM ₁₀	8,150
SO ₂	0.043
VOC	63.5
CO	6.03
NO _x	7.18

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Manganese Compounds	2.48
Chromium Compounds	0.072
MEK	4.44
Toluene	0.041
Methanol	0.788
MIBK	0.559
Xylenes	1.65
TOTAL	10.5

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ is equal to or greater than one hundred (100) tons per year and VOC is equal to or greater than twenty-five (25) tons per year in Lake County. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	not available
PM ₁₀	0.576
SO ₂	0.018
VOC	9.66
CO	0.590
NO _x	2.95
HAP	not available

No previous HAPs emission data have been received from the source.

Potential to Emit After Issuance

The following table summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance

of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Emission Unit	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
EU #1	5.00	5.00	0.00	0.00	0.00	0.00	0.00
EU #2	3.44	3.44	0.00	0.00	0.00	0.00	0.00
EU #9	0.920	0.920	0.00	0.00	0.00	0.00	0.00
EU #11	42.1	42.1	0.00	0.00	0.00	0.00	0.00
EU #13	2.01	2.01	0.00	0.00	0.00	0.00	single<10 total < 25
EU #15	22.1	22.1	0.00	<19.0	0.00	0.00	single<10 total < 25
EU #17	4.68	4.68	0.00	0.00	0.00	0.00	single<10 total < 25
EU #18	14.1	14.1	0.00	0.00		0.00	0.00
EU #7 (Insignificant Activity)	0.014	0.057	0.005	0.041	0.631	0.751	single<10 total < 25
EU #8 (Insignificant Activity)	0.113	0.450	0.036	0.326	4.98	5.92	single<10 total < 25
EU #10 (Insignificant Activity)	0.00	0.00	0.00	1.50	0.00	0.00	0.00
EU #12 (Insignificant Activity)	0.00	0.00	0.00	3.00	0.00	0.00	single<10 total < 25
EU #14 (Insignificant Activity)	0.010	0.038	0.003	0.028	0.420	0.501	single<10 total < 25
Other Insignificant Activities	3.34	3.34	0.00	1.00	0.00	0.00	single<10 total < 25
Total Emissions	97.8	98.2	0.043	<25	6.03	7.18	single<10 total < 25

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	nonattainment
SO ₂	nonattainment
NO ₂	nonattainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.
- (b) Lake County has been classified as nonattainment for PM₁₀ and sulfur dioxide. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Federal Rule Applicability

- (a) The 1.8 million British thermal units per hour natural gas-fired boiler constructed in 1976 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc since the rating is less than ten (10) million British thermal units per hour and was constructed prior to the June 9, 1989 applicability date.
- (b) The degreasing facilities including the four (4) parts washers are not subject to the requirements of the 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAPs) (Halogenated Solvent Cleaning Machine), Subpart T which is incorporated by reference as 326 IAC 20-6-1 because the degreasing operations do not use halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-8-4(9) (Preventive Maintenance Plan)

- (a) A Preventive Maintenance Plan is required for EU #1 and EU #2 because although the allowable PM emissions do not exceed ten (10) pounds per hour and each emission unit has a control device, throughput limits are necessary to avoid the applicability of 326 IAC 2-3 and to comply with 326 IAC 2-8.
- (b) A Preventive Maintenance Plan is required for EU #9 and EU #17 because although the actual PM emissions do not exceed twenty-five (25) tons per year each without control devices, throughput limits are necessary to avoid the applicability of 326 IAC 2-3 and to comply with 326 IAC 2-8.
- (c) A Preventive Maintenance Plan is required for EU #11 because the actual PM emissions exceed twenty-five (25) tons per year without a control device and a throughput limit is necessary to avoid the applicability of 326 IAC 2-3 and to comply with 326 IAC 2-8.

- (d) A Preventive Maintenance Plan is required for EU #13 because although the actual PM emissions from all of EU #13 do not exceed twenty-five (25) tons per year with a control device, a throughput limit is necessary to avoid the applicability of 326 IAC 2-3 and to comply with 326 IAC 2-8.
- (e) A Preventive Maintenance Plan is required for EU #15 because although the actual VOC emissions do not exceed twenty-five (25) tons per year without a control device, a throughput limit is necessary to avoid the applicability of 326 IAC 2-3 and to comply with 326 IAC 2-8.
- (f) A Preventive Maintenance Plan is not required for EU #18 because the allowable PM emissions do not exceed ten (10) pounds per hour and although the emission unit has a control device, a throughput limit is not necessary to avoid the applicability of 326 IAC 2-3 and to comply with 326 IAC 2-8.

326 IAC 2-3 (Emission Offset)

This stationary source is not major because the potential to emit after controls and limits are less than the Emission Offset threshold levels of one hundred (100) tons per year for PM, PM₁₀ and SO₂ and less than twenty-five (25) tons per year for VOC and NO_x. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

In order to avoid the applicability of 326 IAC 2-3, the source has agreed to the following throughput limits:

- (a) The one (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control is limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.
- (b) The one (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control is limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.
- (c) The twelve (12) electric arc stick welders, identified as EU #9, are limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (d) The two (2) plate sweep grinders, identified as EU #11, are limited to 144,000 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (e) The two (2) slab grinders, identified as EU #11, are limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.
- (f) The forty-seven (47) torches, identified as part of EU #13, are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (g) One (1) paint booth, identified as EU #15, is limited to less than 19 tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and 9,881 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (h) The twelve (12) submerged arc welding heads, identified as EU #17, are limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

The above limits listed in items (a) through (f) are equivalent to the following emissions of PM, PM₁₀ and VOC in tons per year:

Emission Unit	Limited Potential to Emit After Controls (tons/year)		
	PM	PM ₁₀	VOC
EU #1	5.00	5.00	0.00
EU #2	3.44	3.44	0.00
EU #9	0.920	0.920	0.00
EU #11	42.1	42.1	0.00
EU # 13	2.01	2.01	0.00
EU #15	22.1	22.1	<19.0
EU #17	4.68	4.68	0.00
Total	80.25	80.25	<19.0

These limited PM of 80.25 tons per year, PM₁₀ of 80.25 tons per year and VOC of less than 19 tons per year combined with the controlled potential to emit from all other emissions units and insignificant activities of 17.55 tons of PM, 17.95 tons of PM₁₀ and 5.9 tons of VOC per year results in the total PM and PM₁₀ of 97.8 and 98.2 as well as VOC of less than 25 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year for Lake County of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂, and CO shall be limited to less than one hundred (100) tons per year and the amount of VOC and NO_x shall be limited to less than twenty-five (25) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemption Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-1, the source located in Lake County, which is a listed county in 326 IAC 6-1-7 and has actual PM emission over ten (10) tons per year shall comply with limitations in 326 IAC 6-1-2. The non-fugitive facilities shall meet the allowable PM emission limitation pursuant to 326 IAC 6-1-2 (a) of 0.03 grains per standard dry cubic feet per minute. The three (3) blasters (EU #1, EU #2 and EU #18), equipped with baghouses comply with 0.03 grains per dry standard cubic foot of outlet air.

The fugitive PM emissions from EU # 9, 11, 13 and 17 shall meet the allowable PM emission limitation pursuant to 326 IAC 6-1-2 (a) of 0.03 grains per standard dry cubic feet per minute. Where the process is totally enclosed and thus it is practical to measure the grain loading, these facilities shall comply with the outlet grain loading emission limit. Those facilities which do not have stacks or vents and are not totally enclosed shall comply with 326 IAC 5-1 and 326 IAC 6-4 in lieu of 326 IAC 6-1-2(a).

326 IAC 6-1-10.1 (Nonattainment area particulate limitations: Lake County PM₁₀ emission requirements)

Industrial Steel Construction, Inc. is not a listed source in 326 IAC 6-1-10.1(d), therefore this rule does not apply to this source.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

The source will be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this opacity limit shall be determined by 40 CFR 60, Appendix A, Method 22.

326 IAC 7-1.1 (Sulfur dioxide emission limitations)

Since the total source potential-to-emit sulfur dioxide is less than twenty-five (25) tons per year or more of SO₂, this rule is not applicable to any facilities.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator in EU #15 Paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings. Currently, all coatings used at source are in compliance with this rule. The source has requested to be able to use daily volume weighted averaging to show compliance should coatings be used with a higher VOC content. The daily volume weighted average of VOC content shall be calculated using the following formula, where n is the number of coatings (c):

$$\begin{aligned}c &= n \\ \frac{3 \text{ coating } c \text{ (gal)} \times \text{VOC content of } c \text{ (lbs/gal, less water)}}{c} &= \frac{1}{n} \\ \frac{3 \text{ coating } c \text{ (gal)}}{c} &= 1\end{aligned}$$

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The source is subject to the requirement of 326 IAC 8-7 since the potential to-emit VOC from the source exceed ten (10) tons per year in Lake County. Pursuant to 326 IAC 8-7-1(b), since all surface coating at the source is subject to 326 8-2-9 (Surface coating emission limitations: miscellaneous metal coating operations), and 326 IAC 8-2 is listed as 326 IAC 8-7-1(a)(1)(A), the source is exempt from the specific VOC reduction requirements of 326 IAC 8-7-3 and subsequent sections of 326 IAC 8-7.

State Rules - Insignificant Activities

326 IAC 6-1-2 (Nonattainment area particulate limitations: specify)

Pursuant to 326 IAC 6-1-2(b)(5), the particulate matter emission from the 1.80 million British thermal units per hour natural gas-fired boiler, identified as EU #7, shall not exceed 0.01 grains per dry standard cubic foot of exhaust air. This emission limit also satisfies the requirements of 326 IAC 6-2-2.

326 IAC 8-3-3 (Organic Solvent Degreasing Operations: Open top vapor degreaser operation)

The four (4) open parts washers, identified as EU #12, are subject to this rule. The owner or operator of open top vapor degreasers shall:

- (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing work loads through the degreaser;
- (c) minimize solvent carry-out by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;

- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Organic Solvent Degreasing Operations: Open top vapor degreaser operation and control requirements)

The four (4) open parts washers, identified as EU #12, are subject to this rule. The owner or operator of open top vapor degreasers shall comply with the requirements of 326 IAC 8-3-6 provided that the air to solvent interface is greater than or equal to one (1) square meter. A copy of the rule is attached.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The blasters (EU #1, EU #2 and EU #18) have applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emissions notations of the blaster stack exhausts (#1, #2, and #18) shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to

prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (2) The Permittee shall record the total static pressure drop across the baghouses controlling the blasters, weekly when the blasting system is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 to 6.0 inches of water for EU #1 and EU #2 and within the range of 1.0 to 4.0 inches of water for EU #18 or ranges established during the latest stack tests. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the blasting processes must operate properly to ensure compliance with 326 IAC 2-3, 326 IAC 6-1 (Nonattainment Area Limitations) and 326 IAC 2-8 (FESOP).

- (b) The two (2) DB torches, part of EU #13, have applicable compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of the two (2) DB torches with smoke eliminators shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (2) Daily inspections shall be performed to verify the placement and integrity of the smoke eliminators. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the smoke eliminators for the two (2) DB torches must operate properly to ensure compliance with 326 IAC 2-3 and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either

carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations on pages 2, 4, 5, 6, 7, 8, of 10 and summarized on pages 9 and 10 of 10 in Appendix A.

Conclusion

The operation of this miscellaneous metal working and bridge beam fabrication source shall be subject to the conditions of the attached proposed FESOP No.: F089-5330-00161.

Appendix A: Emission Calculations

Company Name: Industrial Steel Construction, Inc.
Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
FESOP: F 089-5330
Plt ID: 089-00161
Reviewer: Mark L. Kramer
Date: February 16, 1996

EU #1 Blaster # 1

Actual Hours	5	days/week	8	hours/turn	2 turns/day	4.33 weeks/month
Actual Captured PM	150	plates/turn	18.75	Max. plates/hour Baghouse	99.00% control eff.	
2 Months =	693.3	tons/2 months				
		actual hours of operation		(2 * 5 days/wk * 8 hrs/turn * 2 turns/day*52/12 wks/month)		
Actual Capture PM	10	tons/2 months or		28.85 lbs/hr	(10 tons/2 months * 2 months/693.3 hrs* 2,000 lbs/ton)	
Potential PM Emissions = Before Controls	29.1	lbs/hr or	127.6	tons/yr		
Potential PM Emissions = After Controls	0.291	lbs/hr or	1.28	tons/yr		

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Allowable PM							
EU #1	99.0%	0.0300	22330.0	574.2	2515.00	5.742	25.15
326 IAC 6-1							

Max Capacity: 18.75 plates/hr * 38.4 ft/plate = 720 ft/hr of plates blasted, 720 ft/hr * 8,760 hr/yr = 6,307,200 ft/yr
Limited to: 1,253,916 ft/yr or **5.00 tons/yr of PM and PM-10 after controls**

EU #2 Blaster # 2

Actual Hours	5	days/week	8	hours/turn	2 turns/day	4.33 weeks/month
Actual Captured PM	150	plates/turn	18.75	Max. plates/hour Baghouse	99.00% control eff.	
2 Months =	693.3	tons/2 months				
		actual hours of operation		(2 * 5 days/wk * 8 hrs/turn * 2 turns/day*52/12 wks/month)		
Actual Capture PM	10	tons/2 months or		28.85 lbs/hr	(10 tons/2 months * 2 months/693.3 hrs* 2,000 lbs/ton)	
Potential PM Emissions = Before Controls	29.1	lbs/hr or	127.6	tons/yr		
Potential PM Emissions = After Controls	0.291	lbs/hr or	1.28	tons/yr		

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Allowable PM							
EU #2	99.0%	0.0300	6100.0	156.9	687.03	1.569	6.87
326 IAC 6-1							

Max Capacity: 18.75 plates/hr * 25.6 ft/plate = 480 ft/hr of plates blasted, 480 ft/hr * 8,760 hr/yr = 4,204,800 ft/yr
Limited to: 2,102,400 ft/yr or **3.44 tons/yr of PM and PM-10 after controls**

**Dismantled in
1997
EU #3
Binks Spray
Paint Booth**

	Maximum Capacity gallons/hr	Maximum VOC Content of Coating, less water lbs/gallon	Potential VOC Emissions (tons/yr)
1 Spray Gun	5.5	3.50	84.3

**Dismantled in 1997
EU #4
Hot Air
Paint Drying
Oven**

Combustion Only

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.88	7.34171

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.007	0.028	0.002	0.367	0.020	0.308

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, and 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

EU #4 Combustion Only

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.709E-06	4.405E-06	2.753E-04	6.608E-03	1.248E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.835E-06	4.038E-06	5.139E-06	1.395E-06	7.709E-06

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**SHUTDOWN &
REPLACED BY EU #18 IN 1997**

EU #5 Pneumatic Blaster						
Max Production girders/turn	Hours/Turn	Girder Size square feet	Scale Rust Removed inches	Density of Scale Rust Removed lbs/cubic foot	PM-10/PM	
1	8	840	0.001	160	10.00%	
lbs of PM /girder =	11.20	(840 ft ² *2*0.001in*160 lbs/ft ³ *1ft/12in)				
lbs of PM-10 /girder =	1.12	(PM * 10%)				
Potential PM Emissions = lbs/girder * girders/hr =		1.400	or	6.13	tons/yr	
Potential PM-10 Emissions = PM * 10% =		0.140	or	0.613	tons/yr	

Shut down and removed and replaced by Blaster #3, EU #18

EU #6 Pneumatic Blaster						
Max Production plates/day	Hours/Day	Plate Size square feet	Scale Rust Removed inches	Density of Scale Rust Removed lbs/cubic foot	PM-10/PM	
3	24	846.91	0.001	160	10.00%	
lbs of PM /plate =	11.29	(846.91 ft ² *2*0.001in*160 lbs/ft ³ *1ft/12in)				
lbs of PM-10 /plate =	1.13	(PM * 10%)				
Potential PM Emissions = lbs/plates * plates/hr =		1.412	or	6.18	tons/yr	
Potential PM-10 Emissions = PM * 10% =		0.141	or	0.618	tons/yr	
Actual PM Emissions = 0.010 lbs/hr or 0.45 tons/yr (insignificant activity)						

Insignificant Activity

**EU #7
Boiler**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.80	15.01714

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.014	0.057	0.005	0.751	0.041	0.631

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**EU #7
Boiler**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.709E-06	4.405E-06	2.753E-04	6.608E-03	1.248E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.835E-06	4.038E-06	5.139E-06	1.395E-06	7.709E-06

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Insignificant Activities	Hand Grinding PM=PM-10 =	0.25	tons/year	VOC Insignificant from Storage, etc	1	tons/year	HAPs	0.5	tons/year
Fugitive Trucks PM Emissions Based on Application = 3.09 tons/year									
Insignificant Activity	# of Units	Each	Total						
EU #8	21	0.100	2.10						
61 Space Heaters	12	0.600	7.20						
	28	0.175	4.90						
		Total	14.2						

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

14.20

118.46857

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.113	0.450	0.036	5.923	0.326	4.976

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**61 Space
Heaters**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.709E-06	4.405E-06	2.753E-04	6.608E-03	1.248E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.835E-06	4.038E-06	5.139E-06	1.395E-06	7.709E-06

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

EU #9
Electric Arc Welding (Stick)

# of Welders	Max. Weld Rate rods/minute	Maximum Rod Weight ounces	ounces/lb	AP-42 EF lbs of PM/1000 lbs of rods
12	0.5	4.6	16	18.4
Potential Electrode Use	906660	lbs/yr or	453.33	tons/year
Potential PM Emissions =	8.34	tons/year		
Limited to 50 tons of electrode or		0.92	tons/yr of PM and PM-10	

Insignificant Activity (based on actual emissions)

EU #10
Armor Painting

Actual VOC emissions	Materials	Actual Gallons/Yr Used	VOC Content lbs/gal	Actual VOC Emission tons/yr
	NQA 203	90	4.064	0.183
	#24351	5	3.49	0.009
	#34128	255	3.11	0.397
	#22190	320	2.9	0.464
	#37038	265	2.67	0.354
	#30117	62	3.17	0.098
		Total		1.50

EU #11	Weight of Steel, ounces		Area of Steel	3600	sq. inches			
2 Plate Sweep Grinders	Removed	108.9	Max. Swept	32362	sq ft/month			
Operation	Captured	71.9	lbs of PM/sq ft	0.0925		Potential PM Emissions =	18.0	tons/yr
	PM Emitted	37.00						
Limited to 144,000 sq ft total/yr or		6.66	tons of PM/yr					

EU #11								
2 Slab Grinders		Tons ground in 1999	71054.00	Total Capacity:	10000	tons/mon or	120000	tons/yr
Capacity: 5 tons/month each		Tons removed by Grinding	693.00					
		Tons Captured & Sold			120000 tons/yr * 0.0493% =		59.1	tons/yr
		as Swarf	658.00					
		Tons Emitted	35.00	Limited	35.4	tons/yr or	71866.0	ton of slab/yr
		Emitted	0.0493%					

Insignificant Activity

EU #12			
Parts Washers	Estimated VOC	3	tons/yr

EU#13 Oxy Methane Cutting
40 torches consisting of Linde 100 Gantry Units # 1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit #MG1
7 torches consisting of bug burning units #4 - # 10
2 DB torches consisting of bug mounted #1 and #2 controlled by 99% eff. smoke eliminators

Potential Before Controls					Emissions	Emissions	Emissions	Emissions
# of torches	Max Thickness (inches)	Max Cutting Rate (in/min)	Emission Factors PM & PM-10	lbs/1000 in cut at 1 in thick Mn & Cr	PM & PM-10 (lbs/hr)	Mn & Cr (lbs/hr)	PM & PM-10 (tons/yr)	Mn & Cr (tons/yr)
40	3.375	7	0.0815	0.0002	4.62105	0.01134	20.2	0.0497
7	9.1	3	0.0815	0.0002	0.934479	0.0022932	4.09	0.0100
2	12	9.4	0.0815	0.0002	1.103184	0.0027072	4.83	0.0119
Powder Used with 2 DB torches		12.5 pounds/hour =		54.75	tons/yr		54.75	
					Total		83.9	0.072

Potential After Controls					Emissions	Emissions	After	Controls	After Controls	And Limits	47 torches
# of torches	Max Thickness (inches)	Max Cutting Rate (in/min)	Emission Factors lbs/1000 in cut at 1 in thick	PM & PM-10	PM & PM-10 (lbs/hr)	Mn & Cr (lbs/hr)	PM & PM-10 (tons/yr)	Emissions Mn & Cr (tons/yr)	Emissions PM & PM-10 (tons/yr)	Emissions Mn & Cr (tons/yr)	Throughput Limit (inches/year of 1" cut)
40	3.375	7	0.0815	0.0002	4.62105	0.01134	20.2	0.0497	1.00	0.0025	34601227
7	9.1	3	0.0815	0.0002	0.934479	0.0022932	4.09	0.0100	0.41	0.0010	
2	12	9.4	0.0815	0.0002	0.01103184	0.000027072	0.048	0.0001	0.048	0.0001	
Powder Used with 2 DB torches					tons/yr * (1-.99)						
						Total	24.929	0.060	2.006	0.0036	

Insignificant Activity
EU #14
4 Units at 0.300 MMBTU/hr each
eat Tables and Torches

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.20	10.01143

Pollutant						
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	SO2 0.6	NOx 100.0	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.010	0.038	0.003	0.501	0.028	0.420

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Preheat Tables and Torches

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.051E-05	6.007E-06	3.754E-04	9.010E-03	1.702E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.503E-06	5.506E-06	7.008E-06	1.902E-06	1.051E-05

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

EU#15
Girder Shop Hand Spray Paint Guns and Solvents

Density of Coating	21.3 lbs/gal	HVLP	% Transfer 75.00%	Weight % Solids 84.00%				
Solvents	Maximum Capacity gallons/hr	Maximum VOC Content of Coating, less water lbs/gallon	Potential VOC Emissions (tons/yr)	Limited VOC Emissions (tons/yr)	Potential PM Emissions (tons/yr)	Limited Potential PM Emissions (tons/yr)	Limited Throughput (gal/yr)	
1 Spray Gun	3.76	3.50	57.6	19.0	73.66	22.10	9881.28	

Actual Emissions

Solvents	pounds/yr	Paints	pounds/yr
MEK	6291	Carbo Zinc 11HS	4801.1
Xylene	1193	Carbo Zinc D11 - VOC	245
Carboline #2	38.34	Total	5046.1
Carboline #26	451.44		
Carboline #214	36.72	Total (tons/yr)	2.52305
Subtotal	8010.5		
Manifested Waste	-3724		
Total	4286.5		
Total (tons/yr)	2.14325		

EU#16 **Maintenance Only, Not Production**
Wood Table Saw

0.00 tons/yr

EU#17
Submerged Arc Welders

4.166	lbs/hr wire/head	12 heads =	49.99	pounds of wire/hr or	219.0	tons/yr	Limited to:		
PM = PM-10	0.036	lbs of PM/lb of wire		PM = PM-10 =	7.88	tons/yr	Wire Thoroughput	130.0	tons/yr
Mn	0.011	lbs of Mn/lb of wire		Mn	2.41	tons/yr	PM = PM-10 =	4.68	tons/yr
							Mn	1.43	tons/yr

EU#18
Blaster #3

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
EU#18	99.7%	0.0150	25000.0	1071.4	4692.86	3.214	14.08
Allowable PM							
EU #18	99.7%	0.0300	25000.0	2142.9	9385.71	6.429	28.16
326 IAC 6-1							

HAPs **Actual Emissions Summary**

Girders	Material	lbs/yr
	MEK	6291 Solvent
		20 Carboline Thinner #2
		-3724 Manifested Waste
		2587 Total
		Or 2587/actual hour 0.2953196347032
		1.2935 Total tons/yr

Girders	Methanol	1437 Carboline CZ11 HS	Or	0.1797945205479
		138 Carboline CZ D11 VOC		
		1575 Total		
		0.7875 Total tons/yr		
Girders	Xylene	1193 Solvent	Or	0.2182648401826
		719 Carboline CZ11 HS		
		1912 Total		
		0.956 Total tons/yr		
Armor	Xylene	139.5 Spray paint	Or	0.022448630137
		57.15 NQA203		
		196.65 Total		
		0.098325 Total tons/yr		
Armor	MIBK	450 TTP66D Green	Or	0.1276255707763
		109		
		559		
		1118 Total		
		0.559 Total tons/yr		
Girders	Toluene	81 Toluene		
		0.0405 Total tons/yr		

SUMMARY OF POTENTIAL EMISSIONS BEFORE CONTROLS
tons per year

Emission Unit #	PM	PM-10	SO2	NOx	VOC	CO	Mn	Cr	MEK	Toluene	Methanol	MIBK	Xylenes	Total HAPS
1	2514.996	2514.996	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2	687.034	687.034	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3 (Dismantled)														
4 (Dismantled)														
5 (Dismantled)														
6 (Dismantled)														
7	0.014	0.057	0.005	0.751	0.041	0.631	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
8	0.113	0.450	0.036	5.923	0.326	4.976	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
9	8.341	8.341	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
10	0.000	0.000	0.000	0.000	1.504	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
11	77.071	77.071	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
12	0.000	0.000	0.000	0.000	3.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
13	83.915	83.915	0.000	0.000	0.000	0.000	0.072	0.072	0.000	0.000	0.000	0.000	0.000	0.143
14	0.010	0.038	0.003	0.501	0.028	0.420	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
15	73.665	73.665	0.000	0.000	57.641	0.000	0.000	0.000	3.146	0.000	0.000	0.000	0.597	3.742
16	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
17	7.883	7.883	0.000	0.000	0.000	0.000	2.409	0.000	0.000	0.000	0.000	0.000	0.000	2.409
18	4692.857	4692.857	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Girders	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.294	0.000	0.788	0.000	0.956	3.037
Armor	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.041	0.000	0.559	0.098	0.698
Insignificant Activities	3.340	3.340	0.000	0.000	1.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.500
Total Potential Emissions With Insignificant Activities	8149	8150	0.043	7.175	63.540	6.027	2.480	0.072	4.439	0.041	0.788	0.559	1.651	10.529

SUMMARY OF POTENTIAL EMISSIONS AFTER CONTROLS
tons per year

Emission Unit #	PM	PM-10	SO2	NOx	VOC	CO	Mn	Cr	MEK	Toluene	Methanol	MIBK	Xylenes	Total HAPS
1	25.150	25.150	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2	6.870	6.870	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3 (Dismantled)														0.000
4 (Dismantled)														0.000
5 (Dismantled)														0.000
6 (Dismantled)														0.000
7	0.014	0.057	0.005	0.751	0.041	0.631	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
8	0.113	0.450	0.036	5.923	0.326	4.976	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
9	8.341	8.341	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
10	0.000	0.000	0.000	0.000	1.504	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
11	77.071	77.071	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
12	0.000	0.000	0.000	0.000	3.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
13	24.929	24.929	0.000	0.000	0.000	0.000	0.060	0.120	0.000	0.000	0.000	0.000	0.000	0.179
14	0.010	0.038	0.003	0.501	0.028	0.420	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
15	73.665	73.665	0.000	0.000	57.641	0.000	0.000	0.000	3.146	0.000	0.000	0.000	0.597	3.742
16	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
17	7.883	7.883	0.000	0.000	0.000	0.000	2.409	0.000	0.000	0.000	0.000	0.000	0.000	2.409
18	14.079	14.079	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Girders	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.294	0.000	0.788	0.000	0.956	3.037
Armor	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.041	0.000	0.559	0.098	0.698
Insignificant Activities	3.340	3.340	0.000	0.000	1.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.500
Total Potential Emissions With Insignificant Activities	241	242	0.043	7.175	63.540	6.027	2.468	0.120	4.439	0.041	0.788	0.559	1.651	10.565

SUMMARY OF POTENTIAL EMISSIONS AFTER CONTROLS & LIMITS
tons per year

Emission Unit #	PM	PM-10	SO2	NOx	VOC	CO	Mn	Cr	MEK	Toluene	Methanol	MIBK	Xylenes	Total HAPS
1	5.000	5.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2	3.435	3.435	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3 (Dismantled)														
4 (Dismantled)														
5 (Dismantled)														
6 (Dismantled)														
7	0.014	0.057	0.005	0.751	0.041	0.631	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
8	0.113	0.450	0.036	5.923	0.326	4.976	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
9	0.920	0.920	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
10	0.000	0.000	0.000	0.000	1.504	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
11	42.060	42.060	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
12	0.000	0.000	0.000	0.000	3.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
13	2.006	2.006	0.000	0.000	0.000	0.000	0.004	0.004	0.000	0.000	0.000	0.000	0.000	0.179
14	0.010	0.038	0.003	0.501	0.028	0.420	negligible	negligible	0.000	negligible	0.000	0.000	0.000	negligible
15	22.099	22.099	0.000	0.000	19.000	0.000	0.000	0.000	3.146	0.000	0.000	0.000	0.597	3.742
16	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
17	4.680	4.680	0.000	0.000	0.000	0.000	1.430	0.000	0.000	0.000	0.000	0.000	0.000	2.409
18	14.079	14.079	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Girders	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.294	0.000	0.788	0.000	0.956	3.037
Armor	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.041	0.000	0.559	0.098	0.698
Insignificant Activities	3.340	3.340	0.000	0.000	1.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.500
Total Potential Emissions														
With Insignificant Activities	97.8	98.2	0.043	7.175	24.899	6.027	1.434	0.004	4.439	0.041	0.788	0.559	1.651	10.565